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November 4, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

RE: In the Matter of Request for Review by Bulloch County School
District of Decision of Universal Service Administrator ("USAC"), CC
Docket No. 02-6

To Whom It May Concern:

The following information is provided to appeal the denial of BEAR Invoice Number 2217814, which was rejected by USAC due to being certified by the service provider, Bulloch County Rural Telephone Cooperative, Inc. (hereinafter "Service Provider") on October 29, 2015, one day after the funding year 2014 invoicing deadline. Through this letter, Bulloch County School District ("BCSD") provides required and explanatory information to show good cause for granting an extension of the 2014 invoicing deadline.

Applicant Information:

Applicant Name	Bulloch County School District
Billed Entity Number	127341
Contact Person	Craig Liggett, CIO
Contact Information	150 Williams Road, Suite A Statesboro, GA 30458 Tel: 912-212-8660 cliggett@bullochschools.org
Affected Form 471 Application Numbers and FRNs	953960, FRN 2592444 953298, FRNs 2591613 and 2591504

Service Provider Contact Information:

Service Provider Name	Bulloch County Rural Telephone Cooperative, Inc.
SPIN Number	143001451
Contact Person	John Scott, General Manager
Contact Information	2903 Northside Drive West Statesboro, Georgia 30458 (912) 865-1139 johnscott@bulloch.net

Good Cause for Granting the Appeal:

1. This is the first time that BCSD has requested an extension in its many years of participation in the E-rate program. USAC's procedures allow for applicants to request a single, one-time extension of up to 120 days past the invoice deadline. BCSD did not believe they would need an extension as they submitted their BEAR invoice through E-rate's E-file system in August, 2015, well before the invoice deadline of October 28, 2015. BCSD employs numerous communication and project management tools to stay on top of E-rate deadlines, and works diligently to ensure compliance with all E-rate program rules and regulations.

2. BCSD relies on E-rate funding to support telecommunications and internet access service costs throughout its district. The BEAR invoice number 2217814, containing reimbursement requests for the above-listed FRNs, totals \$102,834.39 in requested reimbursements for funding year 2014. Losing this amount of E-rate funding would cripple the BCSD, and the district would likely not soon recover financially from such a significant loss of funding.

3. BCSD e-mailed Mr. Scott, the Service Provider's General Manager, on September 28, 2015, to inquire about the BEAR form and invoice remittance. Mr. Scott is relatively new to the General Manager position, and has only had to certify one other BEAR form since he assumed the role at the company. Because BCSD only issues BEAR forms on an annual basis, it had been nearly a year since Mr. Scott had last certified a BEAR form, and the process was not familiar or intuitive to him. Unbeknownst to BCSD, Mr. Scott was out of the office during much of the week of October 28th, and was not aware that the deadline for certifying the BEAR form was October 28th. Upon his return to the office, Mr. Scott attempted to certify the BEAR form, and did not know how to access the form in USAC's online portal. He attempted to contact USAC through its main contact number (888) 641-8711, and was unable to identify the appropriate help queues to direct him to E-rate assistance. Upon subsequent attempts to contact USAC, he was able to obtain assistance and was directed to the online BEAR forms. However, at that time, Mr. Scott learned that the service provider had not yet filed its Form 473 for funding year 2014, and therefore the BEAR form could not be processed. Mr. Scott then filed the Service Provider's Form 473, and returned to the online portal on October 29th to certify the BEAR form, only to have it rejected because the 2014

invoicing deadline had expired. A statement from Mr. Scott verifying the accuracy of these statements is included herein as Attachment A, along with the rejection notice received by Mr. Scott from USAC's automated response system.

4. Due to the recent changes on USAC's website, including the creation of the E-Rate Productivity Center ("EPC"), applicants and service providers alike are confused about which online portals to utilize for current E-rate tasks. Therefore, BCSD believes it is appropriate for the FCC to exercise leniency with the current form deadlines to accommodate the confusion within the industry.

Relief Being Sought Through this Appeal:

Through this request, BCSD has demonstrated that it made good faith efforts to comply with the E-rate program rules and meet the program's 2014 invoicing deadline. BCSD respectfully requests that the FCC issue an extension for BCSD's 2014 invoices to allow its funding requests to be honored by USAC.

Your prompt and thorough attention to this request is greatly appreciated. Should you have any questions related to this appeal, please contact the undersigned via the above-listed contact information.

Sincerely,

A handwritten signature in blue ink that reads "James Craig Liggett". The signature is fluid and cursive, with the first name "James" and last name "Liggett" clearly legible, and "Craig" in the middle.

Craig Liggett, CETL
CIO
Bulloch County Schools

Enclosures

cc: Mr. John Scott, General Manager
Bulloch County Rural Telephone Cooperative, Inc.

USAC – Schools and Libraries – Correspondence Unit
via Fax at (973) 599-6526

ATTACHMENT A

AFFIDAVIT OF MR. JOHN SCOTT AND SUPPORTING REJECTION NOTIFICATION FROM USAC

AFFIDAVIT OF JOHN SCOTT

STATE OF GEORGIA

COUNTY OF BULLOCH

BEFORE ME, the undersigned authority on this 3rd day of November, 2015, personally appeared John Scott, who being by me duly sworn on oath deposed and said:

1. My name is John Scott. My position with Bulloch County Rural Telephone Cooperative, Inc. ("the Cooperative") is General Manager. In my position, I am responsible for certifying Billed Entity Applicant Reimbursement ("BEAR") forms for school and library customers that participate in the federal E-rate program.
2. I am of lawful age, am authorized to make the statements herein, and have personal knowledge of the facts stated herein.
3. In connection with the Request for Review by Bulloch County School District of Decision of Universal Service Administrator ("USAC"), CC Docket No. 02-6, I swear and affirm that the statements show in *Good Cause for Granting the Appeal*, subsection 3., are true and correct.


FURTHER AFFIANT SAYETH NOT.



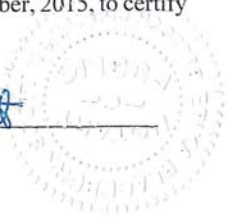
John Scott, General Manager

SUBSCRIBED AND SWORN TO BEFORE ME on this 3rd day of November, 2015, to certify which witness my hand and seal of office.

ERIKA BLACKBURN SCOTT
Notary Public, Bulloch County GA
My Commission Expires Nov. 7, 2016



Notary Public in and for
the State of Georgia



143001451|Bulloch County Rural Telephone Cooperative,
Inc.|johnscott@bulloch.net|usacstatement@universalservice.org|C000676563|3
|0.00|11/2/2015|Y
143001451|2592444|FY14-BTC|0.00|"Applicant Name:BULLOCH COUNTY SCHOOL
DISTRICT;SLD Invoice Number:2217814;BEAR Letter Date:11/02/2015;Line Item
Detail Number:7491380;Amount Requested:16763.97;Invoice Received Date
[10/29/2015] Later Than Invoice Acceptable End Date [10/28/2015];12;"
143001451|2591504|FY14-BTC|0.00|"Applicant Name:BULLOCH COUNTY SCHOOL
DISTRICT;SLD Invoice Number:2217814;BEAR Letter Date:11/02/2015;Line Item
Detail Number:7491381;Amount Requested:66497.47;Invoice Received Date
[10/29/2015] Later Than Invoice Acceptable End Date [10/28/2015];12;"
143001451|2591613|FY14-BTC|0.00|"Applicant Name:BULLOCH COUNTY SCHOOL
DISTRICT;SLD Invoice Number:2217814;BEAR Letter Date:11/02/2015;Line Item
Detail Number:7491382;Amount Requested:19572.95;Invoice Received Date
[10/29/2015] Later Than Invoice Acceptable End Date [10/28/2015];12;"